



United States Department of the Interior  
BUREAU OF INDIAN AFFAIRS  
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Authorized by: SE

Date: 6/12/13

Memorandum

To: Assistant Secretary—Indian Affairs (Operations)

From: Area Director

Subject: Jackpile Uranium Mine Hydrology Study

We are responding to your memorandum of May 18, 1984, concerning the proposed Jackpile Uranium Mine Hydrology Study.

The Bureau of Indian Affairs (BIA) and the Bureau of Land Management (BLM) are cooperating on the Environmental Impact Statement (EIS) for the Jackpile-Paguate Reclamation. The EIS task force is in the process of outlining additional hydrologic studies. The Assistant Secretary, Land and Minerals Management, Dr. Garrey Carruthers, has tentatively arranged for the U.S. Geological Survey (USGS) to do the new hydrology work. Background information on the new study and a statement of work are attached. We propose this work to be obtained from the USGS as the BIA share (\$13,000) of the study. Our recommendations are outlined below.

1. The BIA has determined that presently compiled information and analysis is not adequate for determining levels of groundwater recovery with any degree of confidence and it is not practical to design the Jackpile backfill levels on the basis of the previous studies.
2. The BIA supports a reclamation plan for surface drainage of the mine site to avoid ponded water. This option would overcome the uncertainties in predicting groundwater recovery.
3. Other parties and other issues require additional authoritative support for a decision on groundwater recovery levels.
4. Completion of the attached scope of work would be valuable to demonstrate to the Pueblo and BLM the uncertainty in the hydrology information. The evaluation of both permeability and recharge under work item 3 is particularly critical. Any deletion of items from the proposed scope of work would impair its usefulness to the BIA. Accordingly, we suggest that the BIA seek an interagency agreement with the BLM and USGS for USGS to provide the attached scope of work. If the USGS is unable to provide the required work items, we suggest that the work items may be acquired in a timely manner from an outside specialist and the BIA should withdraw from the USGS study.

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5. The USGS work must be done independently without direct participation by Anaconda or their consultants, except as requested by USGS for data or explanations of Anaconda's previous work. This would avoid bias by Anaconda over the results of the study.
6. If the USGS work requested by the EIA is not committed to proceed by July 8, 1984, then the EIA should obtain the same scope of work from outside sources. Such an approach will allow the Bureau and the EIS participants access to sufficient information to support our position without undue delay to the EIS.

We recommend that the implementation of this study be coordinated with USGS and BLM accordingly.

(Sgd) VINCENT LITTLE  
Area Director

Attachments

cc: Sid Mills, w/Enclosures  
Laguna Agency, w/Enclosures  
BLM, w/Enclosures